

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Case Number: 05 - 11834 GAO

Comcast Of Southern New England, Inc.	)	
(“Comcast”)	)	
Plaintiff	)	
	)	
VS.	)	
	)	
Mary Ahearn	)	
Defendant	)	
	)	

DEFENDANT'S ANSWER  
TO PLAINTIFF'S  
COMPLAINT

1. Defendant is without sufficient knowledge or information to admit or deny allegations contained in paragraph one of the complaint. However Defendant says that she never caused injury to the Plaintiff.
2. Defendant denies that she ever used a statutorily prohibited device and intercepted a Plaintiff's signal illegally.
3. Defendant is without sufficient knowledge to either admit or deny the allegations contained in Paragraph 3 of the Complaint.
4. Defendant resides at 69 Kennedy Drive, North Chelmsford.
5. Defendant is without sufficient knowledge to either admit or deny the allegations contained in Paragraph 5 of the Complaint.
6. Defendant is without sufficient knowledge to either admit or deny the allegations contained in Paragraph 6 of the Complaint.
7. Defendant is without sufficient knowledge to either admit or deny the allegations contained in Paragraph 7 of the Complaint.
8. Defendant is without sufficient knowledge to either admit or deny the allegations contained in Paragraph 8 of the Complaint.
9. Defendant is without sufficient knowledge to either admit or deny the allegations contained in Paragraph 9 of the Complaint.

10. Defendant is without sufficient knowledge to either admit or deny the allegations contained in Paragraph 10 of the Complaint.
11. Defendant is without sufficient knowledge to either admit or deny the allegations contained in Paragraph 11 of the Complaint.
12. Defendant is without sufficient knowledge to either admit or deny the allegations contained in Paragraph 12 of the Complaint.
13. Defendant is without sufficient knowledge to either admit or deny the allegations contained in Paragraph 13 of the Complaint.
14. Defendant is without sufficient knowledge to either admit or deny the allegations contained in Paragraph 14 of the Complaint.
15. Defendant denies the allegation(s) in paragraph 15 of the complaint.
16. Defendant denies the allegation(s) in paragraph 16 of the complaint.
17. Defendant's answers are the same as previously set forth for the allegations in paragraphs 1 through 16.
18. Defendant denies the allegation(s) in paragraph 18 of the complaint.
19. Defendant denies the allegation(s) in paragraph 19 of the complaint.
20. Defendant is without sufficient knowledge to either admit or deny the allegations contained in Paragraph 20 of the Complaint.
21. Defendant denies the allegation(s) in paragraph 21 of the complaint.
22. Defendant is without sufficient knowledge to either admit or deny the allegations contained in Paragraph 22 of the Complaint. Defendant denies illegally taking the Plaintiff's signals.
23. Defendant denies the allegation(s) in paragraph 23 of the complaint.
24. Defendant's answers are the same as previously set forth for the allegations in paragraphs 1 through 23.
25. Defendant denies the allegation(s) in paragraph 25 of the complaint.
26. Defendant denies the allegation(s) in paragraph 26 of the complaint.
27. Defendant denies the allegation(s) in paragraph 27 of the complaint.

#### DEFENDANT'S AFFIRMATIVE DEFENCE

The installation of the new box and removal of the so called "descrambling device" on September 16, 2002 was occasioned by the Defendant's request to Comcast for access to HBO.

The work order for September 16, 2002, (attached hereto "A") shows the order for HBO under "work to be performed".

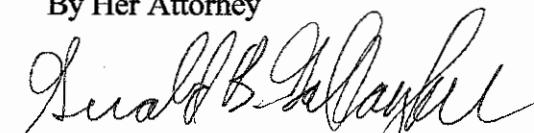
The Plaintiff's action was not brought in accord with the applicable statute of limitation, and was brought so late as to involve laches.

#### DEFENDANT'S COUNTCLAIM

The Defendant says that the Plaintiff had at hand, or within reach, sufficient data to know before beginning suit that the suit had no merit. The Plaintiff was negligent in commencing suit.

The plaintiff requests that the Honorable Court assess damages in terms of emotional distress, commercial time required of the Defendant to defend the case, and attorney fees required in defense of the case.

Mary Ahearn  
By Her Attorney



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